

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Richard D Robinson, Esquire  
3300 Springfield Ave  
Merchantville, New Jersey 08109  
856-206-0264

In Re:  
Denise Todd

Case No.: 16-28518  
[Enter the case number]  
Chapter: 13  
[Enter the chapter; example: 13]  
Hearing Date: 1-24-2017  
[Enter the hearing date]  
Judge: JNP  
[Enter the Judge's last name]

**NOTICE OF MOTION TO  
REINSTATE THE CASE**

Richard Robinson, Esquire on behalf of Debtor Denise Todd has filed papers with the court requesting to reinstate the case.

**YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).**

If you do not want the court to grant this motion, or if you want the court to consider your views, you or your attorney must file with the clerk at the address listed below, a written response explaining your position no later than 7 days prior to the hearing date.

Hearing Date: January 24, 2017  
[Enter the date of the hearing]  
Hearing Time: 10:00 am  
[Enter the time of the hearing]  
Hearing Location: Mitchell H. Cohen U.S. Courthouse  
400 Cooper Street, 4th Floor  
Camden, N.J. 08101  
Courtroom Number: 4C  
[Enter the courtroom number]

If you mail your response to the clerk for filing, you must mail it early enough so the court will receive it on or before 7 days prior to the hearing date.

You must also mail a copy of your response to:

**Isabel C Balboa**, Chapter 13 Trustee  
535 Route 38  
Cherry Hill, NJ 08002

Comcast  
PO Box 182249  
Chattanooga, TN 37422

Dish Network  
PO Box 6633  
Englewood, CO 80112

Kennedy Health System  
2201 Chapel Ave West  
Cherry Hill, NJ 08002

MCI  
PO Box 3427  
Bloomington, IL 61702

Midland Mtg/Midfirst Bank  
Sentry Office Plaza  
216 Haddon Avenue, Ste. 40  
Westmont, NJ 08108

If you, or your attorney, do not take the steps outlined above, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: December 26, 2017  
*[Enter the date this document is signed]*

/s/ Denise Todd  
Signature of the Debtor

Date: \_\_\_\_\_  
*[Enter the date this document is signed]*

\_\_\_\_\_  
Signature of the Joint Debtor, if any

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**CERTIFICATION OF DEBTOR(S)**

I, Denise Todd, debtor in this case,  
submit this Certification in support of my Motion to Reinstate the Case.

1. I am fully familiar with the facts set forth below.

2. I filed for bankruptcy on

September 28, 2016.

3. On

December 9, 2016 the automatic stay was vacated due to the debtor's failure to attend a  
341hearing

4. I request that the stay be reinstated because Debtor is currently suffering from chronic illness that completely incapacitates her for long periods of time. At the time the 341 hearings were scheduled the debtor was very ill and even spent some time hospitalized. Attempts to reach debtor about the scheduling of the 341 hearing went unanswered due to her illness. It was not until December 20, 2016 did debtor's daughter contact our office to inform us of debtor's illness.

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5. *[Enter an additional fact, if any, supporting your reasoning for the stay to be reinstated]*

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6. *[Enter an additional fact, if any, supporting your reasoning for the stay to be reinstated]*

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I certify under penalty of perjury that the above is true.

Date: December 26, 2017  
*[Enter the date this document is signed]*

/s/ Denise Todd  
Signature of the Debtor

Date: \_\_\_\_\_  
*[Enter the date this document is signed]*

\_\_\_\_\_  
Signature of the Joint Debtor, if any

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**STATEMENT AS TO WHY NO BRIEF IS NECESSARY**

In accordance with D.N.J. LBR 9013-1(a)(3), it is respectfully submitted that no brief is necessary in the Court's consideration of this motion, as it does not involve complex issues of law.

Date: December 26, 2017  
[Enter the date this document is signed]

/s/ Denise Todd  
Signature of the Debtor

Date: \_\_\_\_\_  
[Enter the date this document is signed]

\_\_\_\_\_  
Signature of the Joint Debtor, if any

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**CERTIFICATION OF SERVICE**

1. I, Lyann Cruz:

- ☐ represent \_\_\_\_\_ in this matter.
- ☒ am the secretary/paralegal for Richard D Robinson, Esquire, who represents  
Denise Todd in this matter.
- ☐ am the \_\_\_\_\_ in this case and am representing myself.

2. On January 2, 2017, I sent a copy of the following pleadings  
and/or documents to the parties listed in the chart below.

[Place a check next to each document you served]

- ☒ Notice of Motion to Reinstate the Case
- ☒ Certification in Support of Motion to Reinstate the Case
- ☒ Statement as to Why No Brief is Necessary
- ☒ Proposed Order Granting Motion to Reinstate the Case
- ☐ Other [Enter title of document] \_\_\_\_\_

3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date: January 2, 2017  
[Enter the date you signed this document]

/s/ Lyann Cruz  
Signature [Of the person who served the documents]

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Comcast PO Box 182249 Chattanooga, TN 37422	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)
Dish Network PO Box 6633 Englewood, CO 80112	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)
Kennedy Health System 2201 Chapel Ave West Cherry Hill, NJ 08002	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)
MCI PO Box 3427 Bloomington, IL 61702	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/ Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)





Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Midland Mtg/Midfirst Bank Sentry Office Plaza 216 Haddon Avenue, Ste. 40 Westmont, NJ 08108	<i>Debtor</i>	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/ Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)
<i>[Enter the name and address of the party you served]</i>	<i>[Enter the party's relationship to the case]</i>	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/ Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)
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### ORDER GRANTING MOTION TO REINSTATE CASE

The relief set forth on the following page is **ORDERED**.

*[Leave the rest of this page blank]*

The Court having reviewed the debtor's Motion to Reinstate the Automatic Stay, and any related responses or objections, it is hereby

ORDERED that:

1. The automatic stay is reinstated as to all creditors.
2. The debtor shall serve a copy of this order on the trustee, all parties that were served with the Motion, and any parties who objected or responded to the motion.